

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**AD HOC COMMITTEE OF SUPPORTING COUNSEL'S STATEMENT OF ISSUES ON
APPEAL AND DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON
APPEAL AS TO DISMISSAL OPINION AND ORDER**

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Appellant, the Ad Hoc Committee of Supporting Counsel (the “AHC of Supporting Counsel” or the “Appellant”), by and through its counsel, Paul Hastings LLP, Cole Schotz P.C., and Parkins & Rubio LLP, hereby submits, pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, the following statement of issues to be presented on appeal and designation of items to be included in the record on appeal in connection with the Debtor’s appeal from the Bankruptcy Court’s July 28, 2023 *Memorandum Opinion* [Dkt. 1127] (the “Dismissal Opinion”) and the related August 11, 2023 *Order (I) Dismissing Debtor’s Chapter 11 Petition Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures with Respect to Requests for Compensation; and (III) Granting Related Relief* [Dkt. 1211] (the “Dismissal Order and, together with the Dismissal Opinion, the “Opinion and Order”).

STATEMENT OF ISSUES TO BE PRESENTED ON APPEAL

Appellant respectfully joins in the Debtor’s statement of issues to be presented on appeal as set forth in the *Debtor’s Statement of Issues on Appeal and Designation of Items to Be Included in the Record on Appeal as to Dismissal Opinion and Order* [Bankr. Docket No. 1329].

DESIGNATION OF RECORD ON APPEAL

Appellant respectfully joins in the Debtor’s Designation of the Record as set forth in the *Debtor’s Statement of Issues on Appeal and Designation of Items to Be Included in the Record on Appeal as to Dismissal Opinion and Order* [Bankr. Docket No. 1328].

CERTIFICATION REGARDING TRANSCRIPTS

Appellant hereby certifies to the Clerk of Court that it is not ordering any transcripts that are not already included in the record on appeal.

RESERVATION OF RIGHTS

Appellant expressly reserves the right to (i) withdraw, supplement, amend or modify this statement of issues on appeal and designation of items to be included in the record and (ii) move to strike any items included by the Appellees in their *Counter-Designation of Items to be Included in the Record on Appeal*. This filing is made expressly subject to, and without waiver of any and all rights, remedies, challenges, and objections

Dated: September 18, 2023

COLE SCHOTZ P.C.

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